CGB-CC-ONS

The LuCa group, inc.

667 Brea Canyon Road #27 Walnut, CA, 91789 909-468-4637 x108

December 29, 2005

9300 East Hampton Drive Capitol Heights, MD 20743

Dear Commissions' Secretary:

The LuCa group, inc. submits this petition requesting an exemption from the closed captioning requirements, under Section 79.1 of the Commissions' rules. Our company meets one of the following criteria under Section 79.1. We are a small advertising company that produces infomercials for car dealerships.

For legal reasons, we must display specific disclaimers on the screen. We also display graphics that include prices, and monthly payments on screen. We also display graphics of the model, name, and year of the car on the screen. We also display visual motion maps. These graphics are displayed on the screen through the entire infomercial. This meets the Primarily textual programming criteria in Section 79.1 (4).

Furthermore, close captioning all of our productions will pose an undue burden due to constant changes to our ½ hour infomercials. We produce, edit, & re-edit every day, and we would definitely not be able to meet the deadlines that the television stations require if we were to have to close caption all our tapes. I believe that our programming has textual information already. Everything the spokesperson says is literally on the screen as graphic text.

Sincerely,

Mayra Perez

Traffic Manager

## CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California  County of: Los Angeles	
on 12/29/05 before me SooJin Em Nota	ry fublic
personally, appeared Mayra Perez.	
□ personally known to me ☑ proved to me on the basis of evidence.	f satisfactory
to: be the person(sf) whose na subscribed to the within inst acknowledged to me that be/she/ly the same: in brs/her/their capacity(ies) and that by signature(sf) on the instrument the the entity upon behalf of which tacked executed the instrument.	rument and rey executed authorized breffier/their person(x), or
WITNESS my hand and official se	
Place Notary Seal Above	
OPTIONAL Though the information below is not required by law, it may prove valuable to persons relying on the second prevent trauculent removal and realization on this form to another document.	
Description of Attached Document Title of Type of Document  Title of Type of Document	
Document Date 14-9/05 Number of Pages:	
Signer(s) Other Than Named Above:	Environa (
	GTT HUMEPRAT OF SIGNER
□ Individual □ Corporate Officer ─ Title(s). □ Partner ─ □ Limited □ General □ Attorney, in Fact □ Trustee	lop of thumb here.
Guardian; or Conservator  Other	
Signer Is Representing:	